



DEPARTMENT OF THE ARMY  
OFFICE OF THE CHIEF, ARMY RESERVE  
WASHINGTON, DC 20310-2400

August 21, 2002

REPLY TO  
ATTENTION OF

Army Reserve Engineer

Craig Thomas  
U.S. Environmental Protection Agency  
Region V  
ATTN: SRF-5J  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

EPA Region 5 Records Ctr.



341984

Dear Mr. Thomas:

In response to your letter dated July 17, 2002, please find the enclosed replacement pages for the final Quality Assurance Project Plan (QAPP) dated June 2002 for Various Site Remediations, Fort Dearborn U.S. Army Reserve Center. Revisions have been made to Table 8-5 (response to Comment #19), Tables 9-2 through 9-7 (response to Comment #41, Additional General Comment A), and Section 9.2 (response to Comments #11, #23). Please insert the pages in your copies of the document, as appropriate.

The Army understands the United States Environmental Protection Agency's (U. S. EPA) concern on the use of "professional judgment" during the data validation process. Until actual cases are available to undergo the validation process it is not practicable to resolve the "professional judgment" matter beyond what has been stated in the QAPP.

Your letter referred to your expectation that Method 5035 would be used in the handling and analysis of samples for volatile organic compounds. The Army concurs with the Agency's expectation regarding the use of Method 5035. Field sample collection and handling in accordance with Method 5035 is described in Section 3.1 and Section 3.2 of the approved Field Sampling Plan. As previously agreed with U. S. EPA and IEPA, the laboratory will extract and analyze the samples within 48 hours. Sample handling and preparation by the laboratory prior to analysis will be completed in accordance with the procedure specified in Section 3.3 of the Field Sampling Plan.

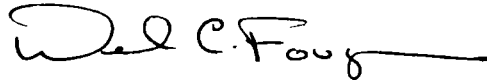
In reference to U. S. EPA's additional general comment "B", Tables 9-2 through 9-7 cite the subject acceptance criteria as the holding time, not "2X the holding time". The holding time is the data validation quality objective. The phrase "2X the holding time" is used only to indicate the flagging criteria and data qualifiers to be used in data validation, in the event the acceptance criteria are not met – like the other QC elements presented. These flagging criteria and qualifiers are supported by and taken directly from the U. S. EPA's Contract

Laboratory Program, National Functional Guidelines for Organic Data Review (EPA540/R-94/012, 1994). Based on this supportive information, we have not removed the holding time flagging criteria but we have changed the table to make the validation process more clear. For clarity, we have made a change in the wording of the data review flagging criteria for holding times. We replaced "Qualify sample results not within criteria" with "Qualify sample results not within the criteria, but <2X the holding time".

I am providing a copy of this letter to Andrew Jankowski in the Illinois Environmental Protection Agency's office located in Springfield, Illinois

Please direct your comments or requests for further information to MAJ Michael Kiene, Project Officer, telephone (703) 601-3406.

Sincerely,

A handwritten signature in black ink, appearing to read "Del C. Fougner", with a long horizontal flourish extending to the right.

Del Fougner  
Colonel, U.S. Army  
Army Reserve Engineer

Enclosures